



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
Department of Labor and Training

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WORKFORCE INVESTMENT NOTICE: 06-11

TO: WORKFORCE INVESTMENT AREAS

FROM: John J. O'Hare, Administrator-Workforce Investment Office

SUBJECT: Allocations for Youth Programs for PY 2007 from the Job Development Fund; oversight and reporting requirements.

DATE: April 30, 2007

1. PURPOSE To provide Locals with the Job Development Fund (JDF) Youth allocations for PY 2007 by the same formula as WIA allocations for PY 06. This policy also details local oversight and reporting requirements.

Be advised that State of Rhode Island requires that each Local Workforce Area establish such fiscal control and fund accounting procedures as may be necessary to assure the proper disbursement of, and accounting for, Job Development Funds allocated to local areas. Such procedures shall ensure that all financial transactions are carried out in compliance with the requirement of paragraph 4. In addition, all transactions shall be conducted and records maintained in accordance with Generally Accepted Accounting Principles and applicable State Policy Issuances.

2. BACKGROUND The Governor's Workforce Board (GWBRI) Youth Development Committee recommended that \$2,000,000 of the JDF be allocated for Youth Strategies. The GWBRI Strategic Investment Committee also approved this proposal. The GWBRI approved the proposal and stated that the funds would be allocated to the locals by formula, through the State Workforce Investment Office. Grants will be awarded by competitive Youth RFP process by the local boards. In addition, the GWBRI required that youth being served under the Job Development Fund contracts be provided an appropriate assessment and services, on an as-needed basis. The services available shall at a minimum include: the WIA youth services ten program elements (WIA Regulations at paragraph 664.410).

3. REPORTING Each Local Workforce Area must submit fiscal and programmatic reports quarterly. The initial report is due November 1, 2007 for the period beginning July 1, 2007 through September 30, 2007. Expenditure of funds and participant data accrued from April 1, 2007 through June 30, 2007 shall be included in the report due November 1, 2007. Fiscal and programmatic reporting forms will be forwarded separately from this WIN Notice. Be advised that the GWBRI's Planning and Evaluation Committee may modify both fiscal and programmatic reporting requirements from time to time.

4. POLICY Each Local Workforce Investment Area receiving Job Development Funds for Youth Services during Program Year 2006 (including the chief elected official of the local area), and providers receiving funds under this title, shall comply with the applicable Circulars and Regulations of the Office of Management and Budget for the type of entity receiving Federal WIA funds and all applicable State and Local Laws. Nothing in this policy shall preclude the entity that is receiving Job Development funds from adopting new policies and procedures or utilizing existing policies and procedures provided they are at least as restrictive as the Federal Circulars and Regulations. The SWIO, therefore, prescribes, at a minimum, the following administrative and fiscal requirements as State Policy.

◆ **Fiscal/Administrative Requirements**

Cross Reference of Administrative Requirements

Requirement	State/Local Government	Nonprofit Organizations	Institutions of Higher Education	Commercial Organizations
Audit	29 CFR Part 99	29 CFR Part 99	29 CFR Part 99	20 CFR 667.200 (b) (ii) (WIA Regulations)
Audit Resolution	29 CFR Part 96	29 CFR Part 96	29 CFR Part 96	20 CFR 667.500 et. seq. (WIA Regulations)
Cost Principles	A-87	A-122	A-21	48 CFR Part 31
Allowable Costs	A-87	A-122	A-21	48 CFR Part 31
Uniform Administrative Requirements	29 CFR Part 97	29 CFR Part 95	29 CFR Part 95	29 CFR Part 95
Lobbying Restrictions	29 CFR Part 93	29 CFR Part 93	29 CFR Part 93	29 CFR Part 93
Suspension and Debarment	29 CFR Part 98	29 CFR Part 98	29 CFR Part 98	29 CFR Part 98
Drug-Free Workplace	29 CFR Part 98	29 CFR Part 98	29 CFR Part 98	29 CFR Part 98

- ◆ **Additional Administrative Requirements** --- Procurement transactions under the Job Development Fund grants between local boards and units of State or local governments shall be conducted only on a cost-reimbursable basis. Administrative costs for sub-recipients receiving Job Development Funds shall not exceed 10% of the total grant award [reference RIGL 42-102-6 (3)]. Contracted vendors administrative cost shall not exceed 15% of the total contract.
- ◆ **Monitoring** --- The State will conduct on an annual basis on-site monitoring of each local area within the State to ensure compliance with the uniform administrative requirements. In addition, the local Workforce Investment Boards shall conduct on a semi-annual basis both internal and on-site monitoring of each of their youth vendors to ensure compliance with the uniform administrative requirements. The Workforce Development Boards will forward a copy of the monitoring report to the SWIO along with documented corrective action.

- ◆ **Action by the Governor** --- If the Governor determines that a local area is not in compliance with the uniform administrative requirements and/or State or Local Law, he shall:
 - (A) require corrective action to secure prompt compliance; and
 - (B) impose the sanctions; to include recapture of funds and termination of the grant award, etc.

5. REFERENCES Reference is made to WIN 05-14 that transmitted to you the WIA percentage allocation formulas for the Adult and Youth programs. In addition, the links have been provided to access the appropriate Regulations and OMB Circulars as amended.

29 CFR Part 99 (A-133)	http://www.whitehouse.gov/OMB/circulars/a133/a133.html
29 CFR Part 96	http://www.access.gpo.gov/nara/cfr/waisidx_98/29cfr96_98.html
29 CFR Part 97	http://www.access.gpo.gov/nara/cfr/waisidx_98/29cfr97_98.html
29 CFR Part 95	http://www.access.gpo.gov/nara/cfr/waisidx_98/29cfr95_98.html
29 CFR Part 93	http://www.access.gpo.gov/nara/cfr/waisidx_98/29cfr93_98.html
29 CFR Part 98	http://www.access.gpo.gov/nara/cfr/waisidx_98/29cfr98_98.html
48 CFR Part 31	http://www.access.gpo.gov/nara/cfr/waisidx_98/48cfr31_98.html
OMB Circular A-21	http://www.whitehouse.gov/OMB/circulars/a021/a021.html
OMB Circular A-87	http://www.whitehouse.gov/OMB/circulars/a087/a087-all.html
OMB Circular A-122	http://www.whitehouse.gov/OMB/circulars/a122/a122.html

6. ACTION This information should be provided to all appropriate WIB Board members/staff, subrecipients and vendors.

7. JDF ALLOCATIONS FOR YOUTH PROGRAMS The JDF allocation for Youth is **\$2,000,000**. The State Set-Aside for JDF Youth is **\$25,000**. The remaining **\$1,975,000** is distributed to the Local Areas according to the percentage allocation formula.

<u>WIA</u>	<u>PERCENTAGE</u>	<u>AMOUNT</u>
WPGRI	50.78	\$ 1,002,905
WSPC	49.22	\$ 972,095

The same administrative restrictions that WIA funds follow (10% of total allocation) will also be used for the JDF funds. Following this format, the Administrative/Programmatic splits will be the following:

	Admin	Program	Total
WPGRI	\$100,290	\$902,615	\$1,002,905
WSPC	\$97,210	\$874,885	\$972,095

4. INQUIRIES. Questions regarding this WIN may be directed to me at 462-8782 (johare@dlt.state.ri.us) or Bob Garofano at 462-8149 (bgarofano@dlt.state.ri.us).